

**IDAHO IRRIGATION PUMPER RECEIVED  
ASSOCIATION**

P. O. BOX 2624  
1109 W. MAIN, SUITE 300  
BOISE, IDAHO 83701-2624  
PHONE: 208.381-0294 FAX: 208.381-5272

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IDAHO PUBLIC  
UTILITIES COMMISSION

June 24, 2011

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
P.O. Box 83720  
Boise, Idaho 83720-0074

Re: Case No. IPC-E-11-05  
Prudency Determination of Energy Efficiency Rider Funds Spent in 2010

Dear Ms. Jewell:

Idaho Irrigation Pumpers Association (IIPA) represents individuals, corporations, associations and businesses interested in providing an inexpensive, reliable electrical supply for Idaho's irrigators. We appreciate this opportunity to comment on Idaho Power Company's Application for a Prudency Determination of Energy Efficiency Rider Funds Spent in 2010.

Idaho Power consistently identifies two objectives for its demand-side management (DSM) programs: achieving all prudent cost-effective energy efficiency and demand response to meet its energy and demand needs; and, (2) providing customers with programs and information to manage their energy usage.

The company estimates that DSM in 2010 provided about 336 megawatts (MWs) of load reduction, almost twice the capacity of its Bennett Mountain peaker plant near Mountain Home, Idaho. In its 2011 Integrated Resource Plan Public Draft, Idaho Power states that "the value of reduced demand compared with building a supply-side capacity resource is nearly twice the value of the cost to run the programs." IIPA believes such a return on investment is a prudent use of Rider funds.

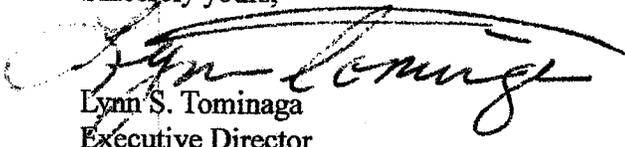
Irrigators participate in two DSM programs: Irrigation Peak Rewards and Irrigation Peak Efficiency. Irrigation Peak Rewards reduced summer peak by almost 250 megawatts in 2010. The total program cost is estimated at \$13 million of which \$11 million was paid in incentives. Irrigation load control provides significant benefits to Idaho Power, but also accounts for significant costs. We believe that the benefits of the program extend beyond the irrigators to all ratepayers, the company and shareholders. This program grew in 2009 and 2010 as IIPA and the company worked collaboratively to redesign a program. IIPA also believes that this program has the potential to be more fully utilized.

June 24, 2011

While IIPA will not recommend to the Idaho Public Utilities Commission a specific amount of expenditure that is prudent, we recognize Idaho Power Company's need to recover their prudent DSM costs in a timely manner and are concerned about deficits that may accumulate in that account. Timely cost recovery contributes to the financial well-being of the company.

IIPA appreciates the opportunity to submit these comments for consideration in this case.

Sincerely yours,



Lynn S. Tominaga  
Executive Director